## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability Litigation	MDL NO. 2:15-md-02641-PHX-DGC	
This document relates to the cases listed on the Exhibit attached hereto.	STIPULATION OF DISMISSAL WITH PREJUDICE	

## STIPULATION OF DISMISSAL WITH PREJUDICE

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto ("Plaintiffs") and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Defendants"), file this Stipulation of Dismissal with Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A with prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety with prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully submitted this 3rd day of December, 2020.

s/Stuart L. Goldenberg
Stuart L. Goldenberg
Stuart L. Goldenberg
slgoldenberg@goldenberglaw.com
GOLDENBERGLAW, PLLC
800 LaSalle Avenue Suite 2150
Minneapolis, MN 55402
P: 612-335-9960
F: 612-367-8107
Attorneys for Plaintiffs

Richard B. North, Jr.
richard.north@nelsonmullins.com
NELSON MULLINS RILEY &
SCARBOROUGH LLP
201 17th St. NW, Ste. 1700
Atlanta, GA 30363
P: 404.322.6000
F: 404.332.6397
Attorneys for Defendants C. R. Bard, Inc. and Bard Peripheral Vascular Inc.

s/Richard B. North, Jr.

## **CERTIFICATE OF SERVICE**

I hereby certify that on <u>December 3<sup>rd</sup>, 2020</u>, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

s/Stuart L. Goldenberg
Stuart L. Goldenberg
Stuart L. Goldenberg
slgoldenberg@goldenberglaw.com
GOLDENBERGLAW, PLLC
800 LaSalle Avenue Suite 2150
Minneapolis, MN 55402
P: 612-335-9960
F: 612-367-8107
Attorneys for Plaintiffs